IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF TEXAS AMARILLO DIVISION

United States of America § § § ex rel. ALEX DOE, Relator, The State of Texas CIVIL ACTION NO. 2:21-CV-00022-Z ex rel. ALEX DOE, Relator, The State of Louisiana ex rel. ALEX DOE, Relator, Date: August 22, 2023 Plaintiffs, v. Planned Parenthood Federation of America, Inc., Planned Parenthood Gulf Coast, Inc., Planned Parenthood of Greater Texas, Inc., § § § Planned Parenthood South Texas, Inc., Planned Parenthood Cameron County, Inc., Planned Parenthood San Antonio, Inc., § Defendants. §

UNOPPOSED MOTION TO WITHDRAW COUNSEL

Defendants Planned Parenthood Gulf Coast, Inc. ("PPGC"), Planned Parenthood of Greater Texas, Inc. ("PPGT") Planned Parenthood South Texas, Inc. ("PPST"); Planned Parenthood Cameron County, Inc. ("PPCC"); and Planned Parenthood San Antonio, Inc. ("PPSA") (collectively, "Affiliate Defendants") file this Unopposed Motion to Withdraw Counsel, Diana Mahoney, in the above-styled and numbered case, and respectfully shows as follows:

- 1. Affiliate Defendants are represented by Arnold & Porter Kaye Scholer LLP in the above-captioned case. Its lead counsel is Tirzah Lollar.
- 2. Diana Mahoney was previously counsel for Affiliate Defendants in the above-captioned case.
 - 3. Ms. Mahoney is no longer employed by Arnold & Porter Kaye Scholer LLP.
 - 4. Undersigned counsel will remain counsel of record for Affiliate Defendants.

- 5. Plaintiffs are unopposed to this Motion.
- 6. Defendant Planned Parenthood Federation of America, Inc. ("PPFA") are unopposed to this Motion.
- 7. For the foregoing reasons, Affiliate Defendants respectfully requests that the Court note the withdrawal of Diana Mahoney as counsel of record in the above-styled and numbered case.

Dated: August 22, 2023 Respectfully submitted,

ARNOLD & PORTER KAYE SCHOLER LLP

By: /s/ Tirzah S. Lollar

Tirzah S. Lollar

Tirzah.Lollar@arnoldporter.com

Craig D. Margolis

Craig.Margolis@arnoldporter.com

Christian Sheehan

Christian.Sheehan@arnoldporter.com

Emily Reeder-Ricchetti

Emily.Reeder-Ricchetti@arnoldporter.com

Megan Pieper

Megan.Pieper@arnoldporter.com

Alyssa Gerstner

Alyssa.Gerstner@arnoldporter.com

601 Massachusetts Ave, NW

Washington, DC 20001-3743

Telephone: +1 202.942.6127

Fax: +1 202.942.5999

Paula Ramer

Paula. Ramer@arnoldporter.com

250 West 55th Street

New York, New York 10019-9710

T: +1 212.836.8474

Christopher M. Odell

Texas State Bar No. 24037205

Christopher.Odell@arnoldporter.com

700 Louisiana Street, Suite 4000

Houston, TX 77002-2755

Telephone: +1 713.576.2400

Fax: +1 713.576.2499

Ryan Patrick Brown

Texas State Bar No. 24073967

brown@blackburnbrownlaw.com

1222 S. Fillmore

Amarillo, TX 79101

Tel: (806) 371-8333 Fax: (806) 350-7716

Attorneys for Defendants Planned Parenthood Gulf Coast, Inc., Planned Parenthood of Greater Texas, Inc., Planned Parenthood South Texas, Inc., Planned Parenthood Cameron County, and Planned Parenthood San Antonio **CETIFICATE OF CONFERENCE**

On August 21, 2023, I conferred with counsel for the State of Texas, Will Wassdorf, who

indicated that the State of Texas is unopposed to this motion. I also conferred with counsel for

Relator, Andrew Stephens, who indicated that Relator is unopposed to this motion. I also conferred

with counsel for PPFA, Danny S. Ashby, who indicated PPFA Defendant is unopposed to this

motion.

/s/ Tirzah S. Lollar

Tirzah S. Lollar

CERTIFICATE OF SERVICE

I hereby certify that on this 22nd day of August, 2023, I caused the foregoing to be

served by email through the Court's Electronic Case Filing system upon all attorneys of record.

/s/ Tirzah S. Lollar

Tirzah S. Lollar